

RESPONSE TO COMMENTS
REGARDING THE MODIFICATION OF THE FOLLOWING NPDES PERMIT
GLOBAL PETROLEUM CORPORATION MA0003425

Introduction:

The U.S. Environmental Protection Agency (EPA) and the Massachusetts Department of Environmental Protection (MassDEP) solicited public comments from May 5, 2006, through June 3, 2006 on the draft National Pollution Discharge Elimination System (NPDES) permit modification to be issued to Global Petroleum Corporation (Global).

The Draft NPDES Permit modification is in response to notification from Global that ethanol would be stored, mixed and distributed on-site. The modification requires monitoring and reporting of ethanol concentrations with sampling for volatile organic compounds in accordance with the current NPDES permit. The facility discharges to Chelsea River.

During the public-notice (comment) period EPA-New England received comments from Aaron Toffler on behalf of the Chelsea Creek Action Group.

In accordance with the provisions of 40 C.F.R. §124.17, this document presents EPA's responses to comments received on the draft NPDES permit modification. The final permit modification is identical to the draft permit modification that was available for public comment.

Comments from Aaron Toffler, Esq., on behalf of Chelsea Creek Action Group

COMMENT NO. 1

CCAG urges EPA to find out what happens when ethanol and gas are mixed with stormwater and released into a tidal river prior to issuing five-year permits for the storage and mixture of ethanol at Global. Until this happens, the community cannot be assured that there will be no harmful results. Until the potential impact of ethanol is clear, this permit modification should either not be granted the full five year time frame, or should include a provision to re-open the permit in the event that it becomes clear that an ethanol, gas and stormwater mixture will negatively impact the Creek.

RESPONSE NO. 1

EPA appreciates the concern expressed in the comment regarding the dearth of specific knowledge relating to the impact of ethanol additives on storm water at bulk petroleum storage facilities. However, general characteristics of ethanol are well known. Ethanol is volatile and spills of undiluted ethanol are likely to volatilize very quickly. In contact with water, ethanol dissolves and biodegrades quickly. The short life of ethanol in the environment contrasts sharply with that of methyl tertiary butyl ether (MTBE), the additive ethanol is replacing, which is much more persistent in both ground water and surface water.

The purpose of the permit modification is to collect the data necessary to evaluate the specific conditions created by the bulk storage and dispensing of ethanol at Global. The modification will expire with the permit on August 31, 2010.

COMMENT NO. 2

Further, given the flammability of ethanol, CCAG would like to see very strict controls placed on the terminal in terms of procedures for the transport, shipment, handling and clean-up of ethanol on site. The neighborhoods along the Creek are already in an area of elevated risk due to all of the oil terminals and other uses located there. The presence of ethanol on the Creek adds another potentially hazardous chemical to the area and could have impacts on air as well as water quality. Global should have very strict and specific protocols for how it will handle the addition of ethanol, including best practices regarding its shipment, storage and mixing.

RESPONSE NO. 2

EPA defers to the City of Boston Fire Department to permit and inspect the fire prevention strategies employed in the storage and handling of ethanol at the East Boston Terminal.